

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

In re:	§	BANKRUPTCY
	§	CASE NO. 3:15-bk-00379-MFH
Rene Edgardo Coto-Lazo	§	
	§	
Debtor.	§	CHAPTER 13
	§	
Rushmore Loan Management Services,	§	
LLC, as servicer for Christiana Trust, A	§	
Division of Wilmington Savings Fund	§	
Society, FSB, as Trustee for Normandy	§	
Mortgage Loan Trust, Series 2013-8	§	
Respondent	§	
v.	§	
Rene Edgardo Coto-Lazo	§	
	§	
Debtor	§	
Henry Edward Hildebrand, III	§	
Trustee	§	
Respondents	§	

---

**If Timely Response is filed by: 03/10/2015**

**Hearing will be held: 04/01/2015 at 8:30 AM, Courtroom 1, 2nd Floor, Customs House, 701 Broadway, Nashville, TN 37203.**

---

**OBJECTION TO CONFIRMATION**

COMES NOW, Rushmore Loan Management Services, LLC, as servicer for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-8 (the “Creditor”), and makes and files its Objection to the Confirmation of the Debtor’s Chapter 13 plan for the reasons set forth below:

1.

Creditor holds a first priority deed of trust on the Debtor’s residence at 2635 Edge O Lake Dr, Nashville, TN 37217.

2.

The date of the scheduled hearing is 04/01/2015 at 8:30 AM, Courtroom 1, 2nd Floor, Customs House, 701 Broadway, Nashville, TN 37203.

3.

The Debtor's plan states arrearage owed to Creditor is \$23,000.00.

4.

Creditor will be filing a proof of claim reflecting an arrearage of \$36,111.65.

5.

The Debtor's plan is inaccurate and does not provide Creditor with adequate protection.

THEREFORE, based upon the above and foregoing facts, Rushmore Loan Management Services, LLC, as servicer for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-8, objects to the Confirmation of the Debtor's Chapter 13 Plan.

This the 10th day of March, 2015

Respectfully Submitted

**/s/Richard B. Maner**

Richard B. Maner, TBN 024019

Attorney for Rushmore Loan Management Services  
LLC

RICHARD B. MANER, P.C.

5775 Glenridge Drive

Building D, Suite 100

Atlanta, GA 30328

404-252-6385 Phone; 404-252-6394 Fax

[rmaner@rbmlegal.com](mailto:rmaner@rbmlegal.com)

## **CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of Respondent's **OBJECTION TO CONFIRMATION** electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Rene Edgardo Coto-Lazo  
2635 Edge O Lake Dr  
Nashville, TN 37217

Daniel Castagna  
Law Offices of James A Flexer  
176 2nd Ave N Ste 501  
Nashville, TN 37201

Henry Edward Hildebrand, III  
Chapter 13 Trustee  
P.O Box 340019  
Nashville, TN 32703-0019

This the 10th day of March, 2015

**/s/Richard B. Maner**

Richard B. Maner, TBN 024019  
Attorney for Rushmore Loan Management Services  
LLC

RICHARD B. MANER, P.C.

5775 Glenridge Drive

Building D, Suite 100

Atlanta, GA 30328

404-252-6385 Phone; 404-252-6394 Fax

[rmaner@rbmlegal.com](mailto:rmaner@rbmlegal.com)